

UNITED STATES DISTRICT COURT
DISTRICT OF MARYLAND

UNITED STATES OF AMERICA

v.

NIJEA NICOLE RICH

Defendant.

Criminal Action No. TDC-22-0180

[JOINT PROPOSED] VOIR DIRE QUESTIONS

I. General Questions

1. This trial is estimated to take up to four days. The trial will take place from 9:00 a.m. to 5:00 p.m., starting today and running through this Thursday. Is there any substantial reason, whether personal, family, or employment related, that you cannot serve as a member of the jury in this case during that time period?
2. Do you have difficulty seeing or hearing, or have any physical condition, mental health condition, or any other medical issue that would prevent you from sitting as a juror in this case and giving your full attention to the evidence presented?
3. Do you have any difficulty understanding the English language to the extent that it would prevent you from following the testimony in this case?
4. Have you ever served as a juror in a criminal trial in either federal or state court?
5. Have you ever served on a grand jury in either federal or state court?
6. Have you or a member of your immediate family ever attended law school or received legal training?

II. Knowledge of the Case or Parties

7. This is a criminal case. In a federal criminal case, charges are brought in the name of the United States Government, represented by the United States Attorney's Office, against a defendant, the person charged with a crime or crimes. In this case, the defendant is Nijea Nicole Rich, ~~and the case relates to [brief summary of the allegations]~~. She is alleged to have conspired with Antione William Tuckson from in or around June 2021 through on or about March 7, 2022 to impersonate officers of the United States, specifically Deputy United States Marshals and Special Deputy United States Marshals of the United States Marshals Service. Ms. Rich is further alleged to have impersonated a Deputy United States Marshal on or about March 6, 2022. Have you read or heard anything about this case from any source?

8. Do you know, have you had any interactions with, or have you heard anything about the defendant, Nijea Nicole Rich?

9. Do you know, or have you had any interactions with, any relatives, friends, or associates of the defendant, Nijea Nicole Rich?

10. Do you know, or have you had any interactions with, one or more of the following persons associated with this case, or members of their families:

- a. Nicholas Madiou and Michael Lawlor, the attorney(s) who represent the defendant in this case;
- b. Assistant United States Attorney Timothy Hagans of the United States Attorney's Office for the District of Maryland, and Trial Attorney Peter Cooch of the Criminal Division, Fraud Section, of the United States Department of Justice, who are the prosecutors in this case; or

- c. United States Postal Inspector ~~Special Agent~~ Steve Cohen, _____ of the United States Postal Service~~[agency]~~, who is the case agent in this case?

11. The United States Attorney's Office for the District of Maryland is led by United States Attorney Erik L. Barron. Do you know Mr. Barron, or any of the Assistant United States Attorneys, or other employees of the United States Attorney's Office for the District of Maryland?

12. Do you know, or have you had any interactions with, any of the following people who may be witnesses in the case or who may be mentioned during the trial: **(A witness list will be provided prior to jury selection, including city/state of residence or employment affiliation for each witness).**

III. History and Views on Issues in the Case

13. Have you or a member of your immediate family ever been employed by the United States Department of Justice, the United States Attorney's Office for the District of Maryland, the United States Marshal Service, the United States Postal Inspector, ~~[investigating agency]~~, the Prince George's County Police Department, or any federal or state prosecutor's office or law enforcement agency?

14. Have you or a member of your immediate family ever been employed by any public defender service, law firm, investigative agency or other business which provides services to persons charged with or convicted of a crime?

15. Do you have any opinions or views, favorable or unfavorable, about the credibility or truthfulness of law enforcement officers?

16. Would you be either more likely, or less likely, to believe the testimony of a witness who is a law enforcement officer just because of the witness's status as a law enforcement officer?

17. Have you or a member of your immediate family ever:

- a. Been the victim of a crime, a witness to a crime, or a witness for the prosecution or defense in any criminal trial;
- b. Been accused of, arrested for, or charged with a crime, or been the subject of a criminal investigation.
- b.c. Been involved in a legal dispute with the government, a law enforcement agency, or with any specific law enforcement officer or agent?

IV. Ability to be Fair and Impartial

24.18. Do you have any views about criminal laws or the administration of justice that would prevent you from being fair and impartial in this case?

25.19. Do you have any deeply held beliefs which would prevent you from judging the conduct of another person?

26.20. At the end of the trial, I will instruct the jury on the law which must be followed in this case. You may have a different understanding of the law, or you may not agree with the law. Would you have any difficulty following my instructions on the law that applies in this case, even if you disagree with it?

27.21. Under our Constitution, there is a presumption that every person charged with a criminal offense is presumed innocent. Would you have any difficulty understanding this principle or applying it in this case?

28.22. In a criminal case, the burden rests with the prosecution to prove the defendant's guilt on each charged offense, and in order for a defendant to be convicted, the prosecution must prove each and every element of an offense beyond a reasonable doubt. The defendant does not have a burden to prove anything. Would you have any difficulty understanding these principles or applying them in this case?

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29-23. Is there any other reason that you would not be able to serve as a juror in this case?

Date:

THEODORE D. CHUANG
United States District Judge